

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889

DIRECT EMAIL shecker@kaplanhecker.com

April 27, 2023

BY ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. We write to respectfully request an adjournment of sentencing, currently scheduled for June 14, 2023, to July 24 or July 25, 2023. Mr. Cole respectfully seeks an extension for two reasons.

[REDACTED]

Second, the parties are engaged in discussions regarding the applicable loss amount for purposes of the sentencing guidelines. The requested adjournment would provide the parties additional time to reach an agreement on the appropriate loss amount, in advance of sentencing.

For these same reasons, we respectfully request that the Court also extend Probation's deadlines for submitting a first and second draft of the presentence report, currently due May 4 and June 1, respectively.

The government consents to this request. This is the first request for adjournment of the sentencing date.

KAPLAN HECKER & FINK LLP

2

The parties are available to answer any questions the Court may have. We appreciate the Court's consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sean Hecker", with a stylized, cursive script.

Sean Hecker